

EXHIBIT D

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Q Since 2000 who were the public records vendors from whom you have been involved on behalf of Equifax buying public records data?

A Okay. In 2000 we were using a company called National Data Retrieval, Superior Information Services, Service Abstract, Southeastern, Hogan Information Services, which may have also at that time been called Dolan Media.

(Reporter interruption.)

THE WITNESS: Dolan, D-o-l-a-n, Media. It was owned by Dolan Media.

So those are the, what we would have called regional vendors. In 2003 ChoicePoint purchased National Data, or acquired I guess is the better word, National Data Retrieval. In 2004 ChoicePoint acquired Superior Information Services and Service Abstract at the same time. Southeastern was not purchased by anyone, but they are no longer a vendor. They no longer operated in that capacity. And Hogan Information Services was purchased by a company called LexisNexis.

1 In, okay. So at this point we are down to
2 two vendors, LexisNexis and ChoicePoint, which
3 went by, their public record division was
4 called Superior Information Services. That
5 particular name was retained. And then in
6 February 2007 LexisNexis purchased the public
7 record division of ChoicePoint called Superior
8 Information Services. So we now have one
9 vendor.

1 Q Let me just ask you a basic question which
2 jumps --

3 A Sure.

4 Q -- right out at me. Why if -- I'm
5 Equifax. Why do I go to LexisNexis or ChoicePoint
6 to buy this data? Why don't I just get it myself?

7 A Because LexisNexis, ChoicePoint, they're
8 the, the industry professionals. They go to the
9 courthouse every day. They have independent
10 contractors that go into the court that understand
11 in the territories they service what the case number
12 should look like, what the information should look
13 like. They're, they are the professionals who, I,
14 I, it would be difficult for me to do what they do
15 nationwide.

16 Q So it's more cost effective, am I
17 correct -- one of the instructions, as you remember,
18 you have to wait until I'm finished asking my
19 question before you respond. Okay?

20 A Sure.

21 Q Would I be correct in basically that your
22 company has made a decision that it's more cost
23 effective to get this data from these companies than
24 it would be to roll out your own program doing it
25 yourself?

1 A I could not say whether it's more cost
2 effective or not, but what I could say is that we
3 feel like that they're the professionals, they're
4 the industry leaders, they're the ones who
5 understand this data and how to collect the data.
6 And it is beneficial to us to use that type of
7 company.

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Q So how long has Equifax had contracts with vendors to buy public records data?

A It is my understanding that our first contract we ever signed with a public record vendor was in 1989, and that company was called Service Abstract. And I think that that was -- we also may have signed a contract with a company called Hollingsworth back then. I was not in the department in 1989, but I believe that we had contracts going back '89, early '90s with most of the vendors that we used in 2000.

Q And do you know, what was Equifax doing before that with regard to public records?

A I believe --

Q Were they not selling it, or were they getting it somewhere else?

A Before that we were more of a regional

1 company. We had regional offices all over the
2 United States, and I believe we had employees who
3 collected it.

4 Q So that you made a decision at some point
5 to stop using your own people to go get it and to go
6 hire these companies to do it, correct?

7 A That's correct.

8 Q Now, just in general we'll go through some
9 of the agreements that have been produced. Having a
10 vendor though means that you have to sign a contract
11 with them, correct?

12 A Correct.

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Q Do you know, for all of the data that Equifax requests its vendors to provide, what parts of the court record the vendors get that data from?

A No, I don't. I would, I would know at a very high level the court record. It has to be the official court record. It has to be what the court considers their record is where that data is extracted. And it has to be in a raw form. It cannot be massaged, changed in any way with respect to the data elements we require.

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7 Q Will you walk me through the process of
8 what the vendor is supposed to do when a consumer
9 disputes to Equifax one of those, one of those
10 bankruptcy record in the consumer's Equifax credit
11 file.

12 A Okay. A consumer comes to Equifax and
13 questions an item, the bankruptcy item in their
14 credit file. What Equifax will do is they tag the
15 bankruptcy. They, you know, pull out the bankruptcy
16 record. We electronically send the information that
17 we have to the vendor along with the question
18 concerned that the consumer provides, and we ask
19 them to go to the court record to check this
20 information and supply the answer back to us. So
21 it's kind of a consumer, us, vendor, court, vendor,
22 us, Equifax.

23 Q Are the vendors required to go to the
24 court in each and every instance?

25 A They are required to go to the official

1 court record.

2 Q Where they got the record from?

3 A Yeah. Well, what is, yes, what is deemed
4 as the official court record.

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23 Q Do you know if, in fact, whether the
24 vendor -- and let's use ChoicePoint and Lexis --
25 whether they always contact the court?

1 A Yes.

2 Q You know they do all the time?

3 A Yes.

4 Q How do you know that?

5 A Because it's in our contract. It's a
6 requirement.

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